



Control Number: 51415



Item Number: 175

Addendum StartPage: 0

PUC DOCKET NO. 51415
SOAH DOCKET NO. 473-21-0538

RECEIVED

APPLICATION OF §
SOUTHWESTERN ELECTRIC §
POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §

2021 FEB -2 AM 10:48
PUBLIC UTILITY
COMMISSION OF TEXAS

EAST TEXAS SALT WATER DISPOSAL COMPANY'S SECOND REQUEST FOR
INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, East Texas Salt Water Disposal Company ("ETSWD") submits this Second Request for Information to Southwestern Electric Power Company ("SWEPCO") attached as Exhibit A, ETSWD requests that SWEPCO provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding, or within 20 days pursuant to 16 TAC § 22.144(c)(1) if a procedural schedule has not been adopted. ETSWD further requests that SWEPCO provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. "SWEPCO," the "Company," "Applicant," "You," and "Your" refer to Southwestern Electric Power Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

2. "Document" and "documents" include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.

8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.

10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.

11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.

12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.

13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.

14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please

furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

Respectfully submitted,

/s/ Todd F. Kimbrough
Todd F. Kimbrough
Texas Bar No. 24050878
Dane McKaughan
Texas Bar No. 24007651
HOLLAND & KNIGHT, LLP
111 Congress Ave. Suite 540
Austin, Texas 78701
Telephone: (512) 954-6520
Fax: (512) 472-7473
Email: todd.kimbrough@hklaw.com
Email: dane.mckaughan@hklaw.com

ATTORNEYS FOR EAST TEXAS SALT
WATER DISPOSAL COMPANY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by email, facsimile, hand-delivery, overnight delivery, or 1st Class U.S. Mail on all parties of record in this proceeding on February 2, 2021.

/s/ Todd F. Kimbrough

EXHIBIT A

EAST TEXAS SALT WATER DISPOSAL COMPANY'S SECOND REQUEST FOR INFORMATION TO SOUTHWESTERN ELECTRIC POWER COMPANY

ETSWD 2-1. Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony, please provide the rate classes under which the three large industrial customers (US Steel, Domtar, and Libbey Glass) received service from SWEPCO.

ETSWD 2-2. Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony regarding the loss of the three large industrial customers (US Steel, Domtar, and Libbey Glass), please explain in detail the pro-forma adjustments SWEPCO made to the test year load and customer data related to the loss of these three industrial customers. Please provide all schedules and workpapers supporting the response.

ETSWD 2-3. Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony:

- a. Did SWEPCO make any pro-forma adjustments to the test year customer and load data for its wholesale jurisdictions other than Texas retail jurisdiction to reflect any impacts from loss of large commercial and industrial customers similar to those of the three industrial customers in Texas retail jurisdiction?
- b. If the answer to (a) is yes, please provide in detail the pro-forma adjustments SWEPCO made to the test year load and customer data reflecting the impacts from loss of large commercial and industrial customers by wholesale jurisdiction.
- c. If the answer to (a) is no, please explain why pro-forma adjustments to the test year customer and load data should not be made for SWEPCO's wholesale jurisdictions other than Texas retail jurisdiction to reflect any impacts from loss of large commercial and industrial customers.
- d. Please provide all schedules and workpapers supporting the responses (a)-(c).

ETSWD 2-4. Referring to pages 9-11 of Mr. Chad M. Burnett's direct testimony:

- a. Did SWEPCO make any pro-forma adjustments to the test year customer and load data for its Texas retail rate classes to reflect any load impacts from the COVID-19 pandemic?
- b. If the answer to (a) is yes, please provide in detail the pro-forma adjustments SWEPCO made to the test year load and customer data reflecting the load impacts from COVID-19 pandemic by Texas retail rate class.

- c. If the answer to (a) is no, please explain why SWEPCO did not make pro-forma adjustments to the test year customer and load data for its Texas retail rate classes to reflect any load impact from COVID-19 pandemic.
- d. Please provide all schedules and workpapers supporting the responses (a)-(c).

ETSWD 2-5. Referring to pages 9-11 of Mr. Chad M. Burnett’s direct testimony:

- a. Did SWEPCO make any pro-forma adjustments to the test year customer and load data for its wholesale jurisdictions other than Texas retail jurisdiction to reflect any load impacts from the COVID-19 pandemic?
- b. If the answer to (a) is yes, please provide: (1) all work papers quantifying load losses related to COVID-19, including methodology for the quantification and (2) in detail the pro-forma adjustments SWEPCO made to the test year load and customer data reflecting the load impacts from COVID pandemic by wholesale jurisdiction.
- c. If the answer to (a) is no, please explain why SWEPCO did not make pro-forma adjustments to the test year customer and load data for its wholesale jurisdictions other than Texas retail jurisdiction to reflect any load impact from COVID-19 pandemic.
- d. Please provide all schedules and workpapers supporting the responses (a)-(c).

ETSWD 2-6. Referring to Mr. John O. Aaron’s direct testimony:

- a. Please explain in detail how the system load factor of 59.26% used in the determination of the Texas retail average and excess demand four coincident (A&E 4CP) demand allocation is calculated.
- b. Please explain the difference between the class Maximum Diversified Demand (“MDD”) and the class Non-Coincident Peak (“NCP”) used for allocating distribution related costs.
- c. Please explain in detail the reason(s) SWEPCO allocates the costs related to line transformer recorded in FERC account 368 based on the class Maximum Diversified Demand (“MDD”).
- d. Referring to Schedule O-1.1:
 - i. Please identify the number of customers adjustments and the kWh sales adjustments made to reflect any loss of large commercial and industrial

- load in each wholesale jurisdiction and each Texas retail class in the schedule.
- ii. Please identify the number of customers adjustments and the kwh sales adjustments made to reflect any load impact from COVID-19 pandemic in each wholesale jurisdiction and each Texas retail class in the schedule.
- e. Referring to Schedule O-1.7:
- i. Please identify the test year billing demand (kW) adjustments made to reflect any loss of large commercial and industrial load in each wholesale jurisdiction and each Texas retail class in the schedule.
 - ii. Please identify the test year billing demand (kW) adjustments made to reflect any load impact from COVID-19 pandemic in each wholesale jurisdiction and each Texas retail class in the schedule.
- f. Referring to Schedule O-4.1:
- i. Please identify the revenue impact adjustments made to reflect any loss of large commercial and industrial load in each wholesale jurisdiction and each Texas retail class in the schedule.
 - ii. Please identify the revenue impact adjustments made to reflect any load impact from COVID-19 pandemic in each wholesale jurisdiction and each Texas retail class in the schedule.
- g. Please provide all schedules and workpapers supporting the responses (a)-(f).